

Message

From: Ho, Yenhung [Ho.Yenhung@epa.gov]
Sent: 4/15/2021 4:16:15 PM
To: Albright, David [Albright.David@epa.gov]
Subject: FW: [EXT] RE: CES Questions
Attachments: Quality--Assurance--Surveillance--Plan.pdf; QMP REVIEW CHECKLIST 2020.pdf

Hi David, here are CES's QASP and the R9 guidance document mentioned in the emails below. Thx.

From: Shari Ring <Shari.Ring@cadmusgroup.com>
Sent: Monday, April 5, 2021 11:05 AM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>; McEvoy, Molly <mcevoy.molly@epa.gov>
Subject: RE: [EXT] RE: CES Questions

Hi Calvin and Molly,

I think the only thing that exists in the way of "guidance" for Class VI QASP development is the template for a QASP in the GSDT. I think most of the documents out there are QA procedures for EPA-funded work (i.e., what an EPA cleanup contractor must do), and we may not be able to hold CES to that.

We confirmed that CES used the template in the GSDT and our review of the QASP was primarily to confirm that all of the planned testing and monitoring was addressed by the QASP.

Please let me know if you would like to discuss this or think that a more intensive review is needed.

From: Ho, Yenhung <Ho.Yenhung@epa.gov>
Sent: Monday, April 5, 2021 1:46 PM
To: McEvoy, Molly <mcevoy.molly@epa.gov>
Cc: Shari Ring <Shari.Ring@cadmusgroup.com>
Subject: [EXT] RE: CES Questions

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Hi Molly,

Thanks HQ for reviewing CES's response on the subsidence issue. We didn't provide CES with the attached QASP guidance. I think Cadmus reviewed their QASP and we asked clarifying questions and/or requesting for additional information based on the requirements of the Class VI rule.

Cheers,
Calvin

From: McEvoy, Molly <mcevoy.molly@epa.gov>
Sent: Friday, April 2, 2021 2:21 PM
To: Ho, Yenhung <Ho.Yenhung@epa.gov>
Subject: CES Questions

Hi Calvin,

First, I wanted to let you know we did review CES's response document you provided that raised the subsidence issue in California. We spoke internally and I don't think we have much insight to offer. Bruce thought he remembered a subsidence issue in Texas affecting a Class I hazardous waste well. He suggested reaching out to Region 6 for their thoughts.

I have a question about the Quality Assurance and Surveillance Plan (QASP) for CES. Did you provide CES with the attached guidance, or any other resources for their QASP? We received a question from one of the other regions whether EPA has specific QASP guidance or requirements for Class VI. I am not aware of anything specific outside of what the Class VI rule requires and guidance documents recommend, so was curious how Region 9 is addressing the CES QASP.

I'll be signing off shortly, but let me know if you'd like me to set up a meeting to discuss these or any other issues related to the CES permit early next week.

Have a nice weekend,
Molly

Molly McEvoy
Office of Ground Water & Drinking Water
U.S. Environmental Protection Agency
Washington, D.C.
Phone: 202-564-4765